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November 21, 2001  
OFFICE OF THE  
EXECUTIVE SECRETARY

David Waddell  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243

Re: Petition of AT&T Communications of the South Central States, Inc., and  
TCG MidSouth Inc. for Structural Separation of BellSouth Telecommunications,  
Inc.  
Docket No: 01-00405

Dear David:

Enclosed please find the original and thirteen copies of a Petition to Intervene filed on  
behalf of The Southeastern Competitive Carriers Association ("SECCA") in the above-captioned  
proceeding. A \$25.00 check is enclosed for the filing fee. Please contact me with any questions.

Very truly yours,

Henry Walker  
Boulton, Cummings, Conners & Berry PLC  
414 Union Street, Suite 1600  
Nashville, TN 37219  
615-252-2363

HW/cw

**BEFORE THE TENNESSEE REGULATORY AUTHORITY  
NASHVILLE, TENNESSEE**

**November 21, 2001**

IN RE:        *Petition of AT&T Communications of the South Central States, Inc., and TCG  
MidSouth. For Structural Separation of BellSouth Telecommunications, Inc*  
Docket No. 01-00405

**PETITION TO INTERVENE**

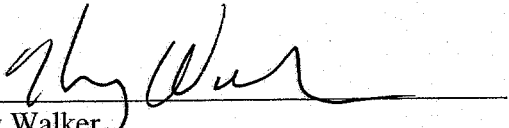
The Southeastern Competitive Carriers Association ("SECCA") petitions the Tennessee Regulatory Authority (the "Authority") to intervene as a matter of right in the above-captioned proceeding pursuant to T.C.A. § 4-5-310.

The above-captioned docket concerns the petition filed by AT&T Communications of the South Central States, Inc., the Competitive Telecommunications Association, and TCG MidSouth to petition the Tennessee Regulatory Authority ("TRA") to convene a contested case to investigate requiring the structural separation of BellSouth Telecommunications, Inc ("BellSouth") into distinct wholesale and retail corporate subsidiaries. This case centers around the need for true competition in the market place for the benefit of competitors and consumers alike.

SECCA is an association composed of competitive telecommunications carriers, including local exchange carriers, many of whom operate or intend to operate in both rural and non-rural areas of Tennessee. SECCA's legal rights, duties, privileges, immunities, or other legal interests or responsibilities may be affected or determined by the outcome of this proceeding, and Petitioner's interest will not be adequately represented unless allowed to intervene.

Granting this petition will not impair the orderly and prompt conduct of these proceedings.

Respectfully submitted,

By:   
Henry Walker  
Boult, Cummings, Conners & Berry, PLC  
414 Union Street, Suite 1600  
P. O. Box 198062  
Nashville, Tennessee 37219  
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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing has been forwarded via U.S. Mail, postage prepaid, to the following on this the 21<sup>st</sup> day of November, 2001.

Guy Hicks, Esq.  
BellSouth Telecommunications, Inc.  
333 Commerce St., Suite 2101  
Nashville, TN 37201-3300

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